

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)
FUND'S OF ILLINOIS, *et al.*,)
)
Plaintiffs,) CIVIL ACTION
)
vs.) NO. 08 C 1161
)
SCHECK INDUSTRIAL CORPORATION,) JUDGE WILLIAM T. HART
a Minnesota corporation,)
)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, SCHECK INDUSTRIAL CORPORATION, a Minnesota corporation, in the total amount of \$41,493.10, plus Plaintiffs' court costs and reasonable attorneys' fees in the total amount of \$3,568.75.

On March 5, 2008, the Summons and Complaint was served on the Registered Agents for Scheck Industrial Corporation and Scheck Mechanical Corp. by tendering copies of said documents to David D. O'Sullivan, personally, at his place of business (copies of the Summons and Affidavits of Service are attached hereto). Therefore, Defendants' answers were due on March 25, 2008. On May 28, 2008, the Court granted Defendant' Motion to Extend Time to Answer to June 3, 2008. On June 11, 2008, Defendant, Scheck Mechanical Corp., an Illinois corporation, was dismissed from the lawsuit. As Defendant, Scheck Industrial Corporation, a Minnesota corporation, has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Thomas A. Christensen
Huck, Bouma, P.C.
1755 S. Naperville Road, Suite 200
Wheaton, IL 60187
tchristensen@huckbouma.com

I hereby certify that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 10th day of September 2008:

Jeffery M. Heftman
Vedder Price, P.C.
222 N. LaSalle Street, Suite 2400
Chicago, IL 60601

I further hereby certify that I have sent the above-referenced document by facsimile to the following non-CM/ECF participant on or before the hour of 4:00 p.m. this 10th day of September 2008:

Jeffery M. Heftman
Vedder Price, P.C.
222 N. LaSalle Street, Suite 2400
Chicago, IL 60601
(312)609-5005

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com